

Phyllis A. Jones (*pro hac vice*)  
 COVINGTON & BURLING LLP  
 One CityCenter  
 850 Tenth Street, NW  
 Washington, DC 20001-4956  
 Telephone: + 1 (202) 662-6000  
 Facsimile: + 1 (202) 662-6291  
 Email: pajones@cov.com

*Attorneys for Defendants Meta Platforms, Inc. f/k/a  
 Facebook, Inc.; Facebook Holdings, LLC; Facebook  
 Operations, LLC; Facebook Payments, Inc.;  
 Facebook Technologies, LLC; Instagram, LLC;  
 Siculus, Inc.; and Mark Elliot Zuckerberg*

*Additional parties and counsel listed on  
 signature pages*

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT  
 ADDICTION/PERSONAL INJURY  
 PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case No. 4:22-md-03047-YGR-TSH

THIS DOCUMENT RELATES TO:

Honorable Yvonne Gonzalez Rogers

ALL ACTIONS

**STIPULATION AND [PROPOSED]  
 ORDER GOVERNING SEALING  
 PROCEDURES**

Plaintiffs and Meta Platforms, Inc., Facebook Holdings, LLC, Facebook Operations, LLC, Facebook Payments, Inc., Facebook Technologies, LLC, Instagram, LLC, Siculus, Inc., and Mark Elliot Zuckerberg; TikTok, Inc. and ByteDance Inc.; Snap Inc.; and YouTube, Inc., Google LLC, and Alphabet Inc. (each a “Party,” and collectively the “Parties”) hereby submit the following Stipulation and [Proposed] Order Governing Sealing Procedures.

WHEREAS, this Court instructed in Case Management Order No. 3 (Dkt. No. 111) that “[i]n large cases, sealing motions can be quite burdensome, overwhelm the docket, and result in additional expense for the parties” and directed the parties to “confer as to a process that will govern in this case

1 and propose a recommendation for the Court’s consideration,” attaching an example of “procedures  
2 that have been endorsed” by the Court (*id.* at 6); and

3 WHEREAS, parties in other matters pending in this District have, with Court approval,  
4 stipulated to modifications of the sealing procedures set forth in the Local Rules to minimize the  
5 burdens of multiple sealing requests, *see, e.g.*, Stipulated Order Modifying Sealing Procedures Relating  
6 to Plaintiffs’ Motion for Sanctions, *In re Google Play Store Antitrust Litigation*, Case No. 3:20-cv-  
7 05671-JD (May 27, 2022) (Dkt. 264) (adopting procedure for omnibus sealing motion to follow  
8 completion of briefing on underlying motion); Stipulated Order Modifying Sealing Procedures, *In re*  
9 *Apple iPhone Antitrust Litigation*, Case. No. 4:11-cv-06714-YGR (Dkt. 664) (adopting procedure for  
10 omnibus sealing motion to follow completion of briefing on underlying class certification motion and  
11 associated filings) (attached as illustrative example to Case Management Order No. 3 (Dkt. No. 111-  
12 1) in the instant action).

13 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, SUBJECT TO THE  
14 COURT’S APPROVAL:

15 1. If a Party files a document (e.g., a brief or exhibit) that contains information  
16 designated by a Party (“designating Party”) or third-party (“designating third party”) as  
17 “confidential,” then the filing Party may file the document(s) provisionally under seal on the ECF  
18 docket, along with a one-page interim sealing motion indicating that the reasons for sealing will be  
19 discussed in a forthcoming omnibus sealing motion. The interim sealing motion shall be served on  
20 all Parties and on any designating third party whose confidential documents are included. For ease  
21 of reference, the Parties shall consistently use the same identifier (e.g., Bates number) when referring  
22 to a given document.

23 2. Within 10 days of the filing of the underlying document(s) provisionally under seal,  
24 each designating Party or third party shall: (1) notify (a) the filing Party and Court of those of its  
25 documents that may be unsealed in their entirety and (b) the filing Party of those of its documents  
26 that should remain sealed in their entirety; and (2) provide to the filing Party redacted versions of  
27 those of its documents that may be filed with appropriate redactions. Within 2 business days after  
28 receiving the same, the filing Party shall file on the public docket a copy of each such redacted

document, as well as any documents that may be unsealed, unless such documents were otherwise made publicly available through the ECF system.

3. The designating Parties and designating third parties shall, within 14 days following the conclusion of briefing on the motion for which the filing was made (e.g., filings in support of or in opposition to *Daubert* or dispositive motions), jointly file an omnibus sealing motion addressing all documents sought to be sealed, in whole or in part, in connection with the underlying motion. Each designating Party or third party's respective position in the joint omnibus sealing motion shall not exceed five pages. *See* L.R. 7-11.

4. Any Party who opposes the omnibus sealing motion, in whole or in part, shall file its response within 14 days after said motion is filed. The opposing Party shall have 5 pages in which to respond to each designating Party or third party's position; put another way, the opposing Party's response shall not exceed the product of five pages times the number of Parties and third parties whose documents are at issue.

5. Within 10 days of the Court's order on the omnibus sealing motion, each designating Party and designating third party shall, as to its documents, apply and provide to the filing Party those redactions approved/ordered by the Court in connection with the omnibus sealing motion. Within 2 business days after receiving the same, the filing Party shall file on the public docket a copy of each such redacted document as well as any documents that the Court ordered unsealed, unless such documents were otherwise made publicly available through the ECF system.

**IT IS SO STIPULATED**, through Counsel of Record.

Dated: February 24, 2023

/s/ Christopher A. Seeger

CHRISTOPHER A. SEEGER

CHRISTOPHER L. AYERS

**SEEGER WEISS, LLP**

55 CHALLENGER ROAD, 6<sup>TH</sup> FLOOR

RIDGEFIELD PARK, NJ 07660

Telephone: + 1 (973) 639-9100

Facsimile: + 1 (973) 679-8656

Email: cseeger@seegerweiss.com

Email: cayers@seegerweiss.com

LEXI J. HAZAM  
**LIEFF CABRASER HEIMANN & BERNSTEIN,  
LLP**

275 BATTERY STREET, 29<sup>TH</sup> FLOOR  
SAN FRANCISCO, CA 94111-3339  
Telephone: + 1 (415) 956-1000  
Email: lhazam@lchb.com

PREVIN WARREN  
**MOTLEY RICE LLC**

401 9th Street NW Suite 630  
Washington DC 20004  
Telephone: + 1 (202) 386-9610  
Email: pwarren@motleyrice.com

Co-Lead Counsel

JENNIE LEE ANDERSON  
**ANDRUS ANDERSON, LLP**  
155 MONTGOMERY STREET, SUITE 900  
SAN FRANCISCO, CA 94104  
Telephone: + 1 (415) 986-1400  
Email: jennie@andrusanderson.com

Liaison Counsel

JOSEPH G. VANZANDT  
**BEASLEY ALLEN CROW METHVIN  
PORTIS & MILES, P.C.**  
234 COMMERCE STREET  
MONTGOMERY, AL 36103  
Telephone: + 1 (334) 269-2343  
Email: joseph.vanzandt@beasleyallen.com

EMILY C. JEFFCOTT  
**MORGAN & MORGAN**  
220 W. GARDEN STREET, 9<sup>TH</sup> FLOOR  
PENSACOLA, FL 32502  
Telephone: + 1 (850) 316-9100  
Email: ejeffcott@forthepeople.com

RON AUSTIN  
**RON AUSTIN LAW**  
400 Manhattan Blvd.  
Harvey LA, 70058  
Telephone: + 1 (504) 227-8100

Email: raustin@ronaustinlaw.com

MATTHEW BERGMAN  
GLENN DRAPER  
**SOCIAL MEDIA VICTIMS LAW CENTER**  
821 SECOND AVENUE, SUITE 2100  
SEATTLE, WA 98104  
Telephone: + 1 (206) 741-4862  
Email: matt@socialmediavictims.org  
Email: glenn@socialmediavictims.org

JAMES J. BILSBORROW  
**WEITZ & LUXENBERG, PC**  
700 BROADWAY  
NEW YORK, NY 10003  
Telephone: + 1 (212) 558-5500  
Facsimile: + 1 (212) 344-5461  
Email: jbilsborrow@weitzlux.com

PAIGE BOLDT  
**WATTS GUERRA LLP**  
4 Dominion Drive, Bldg. 3, Suite 100  
San Antonio, TX 78257  
Telephone: + 1 (210) 448-0500  
Email: PBoldt@WattsGuerra.com

THOMAS P. CARTMELL  
**WAGSTAFF & CARTMELL LLP**  
4740 Grand Avenue, Suite 300  
Kansas City, MO 64112  
Telephone: + 1 (816) 701 1100  
Email: tcartmell@wcllp.com

JAYNE CONROY  
**SIMMONS HANLY CONROY, LLC**  
112 MADISON AVE, 7<sup>TH</sup> FLOOR  
NEW YORK, NY 10016  
Telephone: + 1 (917) 882-5522  
Email: jconroy@simmonsfirm.com

CARRIE GOLDBERG  
**C.A. GOLDBERG, PLLC**  
16 Court St.  
Brooklyn, NY 11241  
Telephone: + 1 (646) 666-8908  
Email: carrie@cagoldberglaw.com

KIRK GOZA

**GOZA & HONNOLD, LLC**

9500 Nall Avenue, Suite 400  
Overland Park, KS 66207  
Telephone: + 1 (913) 451-3433  
Email: kgoza@gohonlaw.com

SIN-TINY MARY LIU

**AYLSTOCK WITKIN KREIS & OVERHOLTZ,  
PLLC**

17 EAST MAIN STREET, SUITE 200  
PENSACOLA, FL 32502  
Telephone: + 1 (510) 698-9566  
Email: mliu@awkolaw.com

ANDRE MURA

**GIBBS LAW GROUP, LLP**

1111 BROADWAY, SUITE 2100  
OAKLAND, CA 94607  
Telephone: + 1 (510) 350-9717  
Email: amm@classlawgroup.com

EMMIE PAULOS

**LEVIN PAPANTONIO RAFFERTY**

316 SOUTH BAYLEN STREET, SUITE 600  
PENSACOLA, FL 32502  
Telephone: + 1 (850) 435-7107  
Email: epaulos@levinlaw.com

ROLAND TELLIS

DAVID FERNANDES

**BARON & BUDD, P.C.**

15910 Ventura Boulevard, Suite 1600  
Encino, CA 91436  
Telephone: + 1 (818) 839-2333  
Facsimile: + 1 (818) 986-9698  
Email: rtellis@baronbudd.com  
Email: dfernandes@baronbudd.com

ALEXANDRA WALSH

**WALSH LAW**

1050 Connecticut Ave, NW, Suite 500  
Washington D.C. 20036  
Telephone: + 1 (202) 780-3014  
Email: awalsh@alexwalshlaw.com

MICHAEL M. WEINKOWITZ

**LEVIN SEDRAN & BERMAN, LLP**

510 WALNUT STREET

SUITE 500  
PHILADELPHIA, PA 19106  
Telephone: + 1 (215) 592-1500  
Email: mweinkowitz@lfsbalw.com

DIANDRA "FU" DEBROSSE ZIMMERMANN  
**DICELLO LEVITT**  
505 20<sup>th</sup> St North  
Suite 1500  
Birmingham, Alabama 35203  
Telephone: + 1 (205) 855-5700  
Email: fu@dicellolevitt.com

ROBERT H. KLONOFF  
**ROBERT KLONOFF, LLC**  
2425 SW 76<sup>TH</sup> AVENUE  
PORTLAND, OR 97225  
Telephone: + 1 (503) 702-0218  
Email: klonoff@usa.net

HILLARY NAPPI  
**HACH & ROSE LLP**  
112 Madison Avenue, 10th Floor  
New York, New York 10016  
Telephone: + 1 (212) 213-8311  
Email: hnappi@hrsclaw.com

ANTHONY K. BRUSTER  
**BRUSTER PLLC**  
680 N. Carroll Ave., Suite 110  
Southlake, TX 76092  
Telephone: + 1 (817) 601-9564  
Email: akbruster@brusterpllc.com

FRANCOIS M. BLAUDEAU, MD JD FACHE FCLM  
**SOUTHERN INSTITUTE FOR MEDICAL AND  
LEGAL AFFAIRS**  
2762 B M Montgomery Street, Suite 101  
Homewood, Alabama 35209  
Telephone: + 1 (205) 564-2741  
Email: francois@southernmedlaw.com

JAMES MARSH  
**MARSH LAW FIRM PLLC**  
31 HUDSON YARDS, 11TH FLOOR  
NEW YORK, NY 10001-2170  
Telephone: + 1 (212) 372-3030

Email: jamesmarsh@marshlaw.com

*Attorneys for Plaintiffs*

**COVINGTON & BURLING LLP**

/s/ Phyllis A. Jones

Phyllis A. Jones, *pro hac vice*

Paul W. Schmidt, *pro hac vice*

COVINGTON & BURLING LLP

One CityCenter

850 Tenth Street, NW

Washington, DC 20001-4956

Telephone: + 1 (202) 662-6000

Facsimile: + 1 (202) 662-6291

Email: pajones@cov.com

Email: pschmidt@cov.com

Emily Johnson Henn (State Bar. No. 269482)

COVINGTON & BURLING LLP

3000 El Camino Real

5 Palo Alto Square, 10th Floor

Palo Alto, CA 94306

Telephone: + 1 (650) 632-4700

Facsimile: +1 (650) 632-4800

Email: ehenn@cov.com

*Attorney for Defendants Meta Platforms, Inc. f/k/a  
Facebook, Inc.; Facebook Holdings, LLC; Facebook  
Operations, LLC; Facebook Payments, Inc.;  
Facebook Technologies, LLC; Instagram, LLC;  
Siculus, Inc.; and Mark Elliot Zuckerberg*

**KING & SPALDING LLP**

/s/ Geoffrey M. Drake

Geoffrey M. Drake

King & Spalding LLP

1180 Peachtree Street, NE, Suite 1600

Atlanta, GA 30309

Telephone: + 1 (404) 572-4600

Facsimile: + 1 (404) 572-5100

Email: gdrake@kslaw.com



**FAEGRE DRINKER LLP**

/s/ Andrea Roberts Pierson

Andrea Roberts Pierson  
Faegre Drinker LLP  
300 N. Meridian Street, Suite 2500  
Indianapolis, IN 46204  
Telephone: + 1 (317) 237-0300  
Facsimile: + 1 (317) 237-1000  
Email: andrea.pierson@faegredrinker.com

*Attorneys for Defendants TikTok Inc. and ByteDance Inc.*

**MUNGER, TOLLES & OLSEN LLP**

/s/ Jonathan H. Blavin

Jonathan H. Blavin, SBN 230269  
MUNGER, TOLLES & OLSON LLP  
560 Mission Street, 27th Floor  
San Francisco, CA 94105-3089  
Telephone: (415) 512-4000  
Facsimile: (415) 512-4077

Rose L. Ehler (SBN 29652)  
Victoria A. Degtyareva (SBN 284199)  
Ariel T. Teshuva (SBN 324238)  
MUNGER, TOLLES & OLSON LLP  
350 South Grand Avenue, 50th Floor  
Los Angeles, CA 90071-3426  
Telephone: (213) 683-9100  
Facsimile: (213) 687-3702

Lauren A. Bell, *pro hac vice*  
MUNGER, TOLLES & OLSON LLP  
601 Massachusetts Ave., NW St.,  
Suite 500 E  
Washington, D.C. 20001-5369  
Telephone: (202) 220-1100  
Facsimile: (202) 220-2300

*Attorneys for Defendant Snap Inc.*

**WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation**

*/s/ Brian M. Willen*

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Brian M. Willen  
Wilson Sonsini Goodrich & Rosati  
bwillen@wsgr.com  
1301 Avenue of the Americas, 40th Floor  
New York, New York 10019  
Telephone: (212) 999-5800  
Facsimile: (212) 999-5899

Lauren Gallo White  
Wilson Sonsini Goodrich & Rosati  
lwhite@wsgr.com  
Samantha A. Machock  
smachock@wsgr.com  
One Market Plaza, Spear Tower, Suite 3300  
San Francisco, CA 94105  
Telephone: (415) 947-2000  
Facsimile: (415) 947-2099

Christopher Chiou  
Wilson Sonsini Goodrich & Rosati  
cchiou@wsgr.com  
633 West Fifth Street  
Los Angeles, CA 90071-2048  
Telephone: (323) 210-2900  
Facsimile: (866) 974-7329

*Attorneys for Defendants YouTube, LLC,  
Google LLC, and Alphabet Inc.*

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: \_\_\_\_\_

THE HONORABLE YVONNE GONZALEZ ROGERS

**ATTESTATION**

I, Phyllis A. Jones, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: February 24, 2023

By: /s/ Phyllis A. Jones  
Phyllis A. Jones